

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
ABILENE DIVISION**

A.A.R.P., on his own behalf and on	§	
behalf of all others similarly situated,	§	
et al.,	§	
	§	
Petitioners-Plaintiffs,	§	
	§	No. 1:25-CV-059-H
v.	§	
	§	
DONALD J. TRUMP, et al.	§	
	§	
Respondents-Defendants.	§	

DECLARATION OF YOUSUF KHAN

In accordance with the provisions of Section 1746 of Title 28, United States Code, I, the undersigned, Yousuf Khan, do hereby make the following declaration, under penalty of perjury in the above-styled and numbered cause:

1. I, Yousuf Khan, am presently employed by the United States Department of Homeland Security (“DHS” or the “Department”), Immigration and Customs Enforcement (“ICE”), in the position of Assistant Field Office Director.
2. I am familiar with the cases of A.A.R.P., W.M.M., and F.G.M.
3. A.A.R.P. [REDACTED] has been detained in ICE custody since March 26, 2025. He is currently at the Bluebonnet Detention Center in Anson, Texas.
4. A.A.R.P. has not been served notification that he is subject to removal pursuant to the Alien Enemies Act (“AEA”).
5. W.M.M. [REDACTED] has been detained in ICE custody since March 17, 2025. He is currently at the Bluebonnet Detention Center in Anson, Texas.

6. W.M.M. has not been served notification that he is subject to removal pursuant to the AEA.
7. F.G.M. [REDACTED] has been detained in ICE custody since March 31, 2025. He is currently at the Bluebonnet Detention Center in Anson, Texas.
8. F.G.M. has not been served notification that he is subject to removal pursuant to the AEA.
9. I am aware that, in the case of *Trump, et al. v. J.G.G., et al.*, --- S.Ct. ----, 2025 WL 1024097 (U.S. Apr. 7, 2025), the Supreme Court of the United States stated that “detainees [held for removal under the Alien Enemies Act (AEA)] are entitled to notice and the opportunity to be heard.”
10. ICE has adopted processes for individuals detained under the AEA for removal.
11. These processes require that each individual be provided notice of the proceedings, in a language the alien understands. They allow time and opportunity to file a habeas petition.
12. ICE is aware that A.A.R.P., W.M.M., and F.G.M. are plaintiffs in the instant habeas petition.
13. ICE does not intend to remove A.A.R.P., W.M.M., or F.G.M. under the AEA while their habeas petitions are pending.

Sworn to and subscribed this 25th day of April, 2025.

A handwritten signature in blue ink, appearing to read 'Yousuf Khan', is written above a horizontal line.

Yousuf Khan
Assistant Field Office Director
Department of Homeland Security
Immigration and Customs Enforcement